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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:)	
)	
EASY STREET HOLDING, LLC, <i>et al.</i> ,)	Bankruptcy Case No. 09-29905
)	Jointly Administered with Cases
)	09-29907 and 09-29908
)	
Address: 201 Heber Avenue)	Chapter 11
Park City, UT 84060)	
)	Honorable R. Kimball Mosier
Tax ID Numbers:)	
35-2183713 (Easy Street Holding, LLC),)	
20-4502979 (Easy Street Partners, LLC), and)	[FILED ELECTRONICALLY]
84-1685764 (Easy Street Mezzanine, LLC))	
)	

**WRONA LAW FIRM'S RESPONSE TO THE OBJECTIONS OF
WESTLB, AG, GATEWAY CENTER, LLC AND THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS TO THE SECOND
APPLICATION OF WRONA LAW FIRM FOR INTERIM COMPENSATION**

Wrona Law Firm, P.C. files this response to WestLB, AG, Gateway Center, LLC and The Official Committee of Unsecured Creditors to the Second Application of Wrona Law Firm ("Wrona Law") for Interim Compensation.

1. On October 23, 2009, the Court entered its Order Approving Easy Street Partners, LLC ("Partners"), Easy Street Mezzanine, LLC ("Mezzanine"), and Easy Street Holding, LLC ("Holding") (together, Partners, Mezzanine, and Holding will be referred to as the "Debtors")

employment of Wrona Law Firm (“Wrona Law”) as Co-Counsel, effective as of September 14, 2009.

2. Wrona Law has represented Debtors for the past eight months including working to facilitate and maintain the complex legal relationships between Debtors’ members, and between Debtor and the numerous individual owners of condominium interests in Debtor’s Sky Lodge property. Wrona Law has also worked with Debtor to obtain an assignment of interests held by one of Debtor’s members, and Wrona Law has worked successfully to locate and introduce sources of Debtor-in-Possession and/or Exit Financing. Wrona Law has assisted Debtor in legally managing the interplay between the Jacobsen Mechanic’s Lien and the condominium owners, and Wrona Law has managed local media relations for Debtor. Wrona Law has also assisted Debtors in legally managing the interplay between the Jacobsen Mechanic’s Lien and the condominium owners. Finally, Wrona Law has also worked efficiently to analyze and stay a landlord-tenant dispute that could otherwise have adversely impacted the rights and obligations of Debtors and/or the Debtors’ ability to operate the Sky Lodge Hotel Condominium Resort.

3. Wrona Law has submitted its Second Interim Fee Application in the amount of \$34,717.50, representing 104.1 hours in performing this work for Debtors.

4. WestLB, AG, Gateway Center, LLC and The Official Committee of Unsecured Creditors object to Wrona Law’s Second Interim Fee Application, asking the Court to deny some or all of that request, arguing that Wrona Law has performed substantial work for an insider of Debtors during this time, and that Wrona Law did not seek prior approval to perform that work.

5. The objections are based on the mistaken assumption that Wrona Law provided substantial legal representation to Mr. William Shoaf and CloudNine, LLC in the state court action entitled *Gateway Center, LLC v. CloudNine Resorts, LLC, et al.*, Case No. 100500193, Third District Court, Summit County, State of Utah ("State Court Action").

6. In reality, Wrona Law performed all work in the State Court Action at the request of Debtors and for the benefit of Debtors. *See* Affidavit of Kim T. Sallinger (Exhibit A).

7. The work in dispute involved 2.5 hours of billable time, i.e. \$875, that was requested by Debtors, and Debtors have confirmed that the work was requested by Debtors for the benefit of Debtors, and that it was billed to the Debtors at the request of the Debtors.

DATED: June 24, 2010.

WRONA LAW FIRM, P.C.

By: 

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Special Counsel for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that on this 24 day of June, 2010, I caused to be delivered via first class mail, postage-prepaid, a true and correct copy of the foregoing document upon the following:

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